

Amy M. Samberg, NV Bar No. 10212
asamberg@fgppr.com
FORAN GLENNON PALANDECH
PONZI & RUDLOFF PC
400 East Van Buren Street, Suite 550
Phoenix, AZ 85004
Telephone: 602-926-9880
Facsimile: 312-863-5099

Dylan P. Todd, NV Bar No. 10456
dtodd@fgppr.com
Lee H. Gorlin, NV Bar No. 13879
lgorlin@fgppr.com
FORAN GLENNON PALANDECH
PONZI & RUDLOFF PC
2200 Paseo Verde Parkway, Suite 280
Henderson, NV 89052
Telephone: 702-827-1510
Facsimile: 312-863-5099

*Attorneys for Standard Fire Insurance
Company, erroneously named as The
Travelers Indemnity Company dba The
Travelers Home and Marine Insurance
Company*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

TAEKKEUN YOON, an individual; SU JUNG
KIM, an individual,

Plaintiffs,

v.

THE TRAVELERS INDEMNITY COMPANY,
dba TRAVELERS HOME AND MARINE
INSURANCE COMPANY, a Connecticut
Corporation; DOES I through XV, and ROE
Corporations I through X, inclusive,

Defendants.

CASE NO. 2:20-cv-01507-JCM-EJY

**STIPULATION AND ORDER
EXTENDING THE TIME FOR
PLAINTIFFS TO RESPOND TO
DEFENDANT THE STANDARD FIRE
INSURANCE COMPANY'S MOTION
TO DISMISS [ECF NO. 6] (SECOND
REQUEST)**

IT IS HEREBY STIPULATED AND AGREED by Plaintiffs Taekkeun Yoon and Su Jung

Kim ("Plaintiffs") and Defendant The Standard Fire Insurance Company ("Standard Fire"), by and through their respective counsel, that the time for Plaintiffs to file and serve their Response to Standard Fire's Motion to Dismiss Plaintiffs' Complaint (ECF No. 6) be extended 7 days through and including Monday, October 12th, 2020.

Pursuant to Fed. R. Civ. P. 6(b)(1)(A) and Local Rule IA 6-1(a), Plaintiffs represent that points and authorities presented in Standard Fire's Motion require additional time to review and to present an adequate and thorough counter-argument and supporting authorities. Further, with the necessities of working remotely due the ongoing COVID-19 pandemic additional time is required for counsel to prepare its Response and to obtain client review and approval of the Response.

Accordingly, the Plaintiffs and Standard Fire hereby agree and stipulate to allow Plaintiffs until October 12, 2020 to file its Response to Standard Fire's Motion to Dismiss. Further, the parties respectfully request this honorable Court enter an Order providing the same.

DATED: October 6, 2020

THE LAW FIRM OF PARKE ESQUIRE

By: /s/ Jose E. Valenzuela
 Jose E. Valenzuela III, Esq. (NV Bar No. 12510)
 V3Law, LLC
 4484 S. Pecos Rd., Ste. 140
 Las Vegas, NV 89121

Attorney for Plaintiffs

DATED: October 6, 2020

FORAN GLENNON PALANDECH PONZI & RUDLOFF PC

By: /s/ Dylan P. Todd
 Amy M. Samberg (NV Bar No. 10212)
 400 E. Van Buren Street, Suite 550
 Phoenix, AZ 85004

Dylan P. Todd (NV Bar No. 10456)
 Lee H. Gorlin (NV Bar No. 13879)
 2200 Paseo Verde Parkway, Suite 280
 Henderson, NV 89052

Attorneys for Standard Fire Insurance Company, erroneously named as The Travelers indemnity Company dba The Travelers Home and Marine Insurance Company

IT IS SO ORDERED:


 UNITED STATES DISTRICT JUDGE

DATED: October 7, 2020.

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing **STIPULATION AND ORDER EXTENDING THE TIME FOR PLAINTIFFS TO RESPOND TO DEFENDANT THE STANDARD FIRE INSURANCE COMPANY'S MOTION TO DISMISS [ECF NO. 6] (SECOND REQUEST)** was served by the method indicated:

- ☐ **BY FAX:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document(s).
- ☐ **BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed as set forth below.
- ☒ **BY ELECTRONIC SERVICE:** submitted to the above-entitled Court for electronic service upon the Court's Registered Service List for the above-referenced case.
- ☐ **BY EMAIL:** by emailing a PDF of the document listed above to the email addresses of the individual(s) listed below.

Dated: October 6, 2020

/s/ Jennifer Parsons
An Employee of Foran Glennon